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14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 WESTERN WATERSHEDS PROJECT,)
17 Plaintiff,)
18 v.)
19 DOUG BURGUM, in his capacity as Secretary)
20 of the Interior; and U.S. FISH AND WILDLIFE)
21 SERVICE,)
22 Defendants.)

Case No: 2:23-cv-02009-GMN-EJY

**JOINT MOTION TO EXTEND
SCHEDULING ORDER**

JOINT MOTION TO EXTEND SCHEDULING ORDER

24 Plaintiff Western Watersheds Project and Federal Defendants the U.S. Fish and
25 Wildlife Service and Doug Burgum, in his official capacity as Secretary of the Interior, hereby
26 move to amend the Court's Order (ECF No. 65) granting the Joint Motion for Entry of
27 Scheduling Order (ECF No. 64) due to scheduling conflicts. Plaintiff Western Watersheds
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1 Project and Defendants conferred on a revised schedule for production of the administrative
2 record and briefing. Additionally, Plaintiff conferred with former Defendant Clark County on
3 the parties' joint proposed revised schedule since the Court granted the Proposed Stipulation
4 and Order to Permit Clark County to File an Amicus Brief (ECF Nos. 64, 67). Clark County
5 does not have any issue with the proposed revised schedule. Therefore, the parties respectfully
6 request that the Court enter the following revised schedule in this case:
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8 **A. Administrative Record**

- 9 1. Pursuant to Fed. R. Civ. P. 12(a)(4), Federal Defendants' answer is due **April 9,**
10 **2025.** (Defendants have already complied with this deadline. ECF No. 68).
- 11 2. No later than **August 25, 2025,** Federal Defendants shall provide Plaintiff with
12 the index to the Administrative Record for this case.
- 13 3. No later than **September 8, 2025,** Plaintiff will notify Federal Defendants of any
14 concerns regarding the contents the Administrative Record.
- 15 4. The parties shall confer and attempt to informally resolve any disputes regarding
16 the Administrative Record no later than **September 15, 2025.** The parties will
17 inform the Court in a status report no later than **September 15, 2025,** whether
18 they agree that the Administrative Record is complete.
- 19 5. Federal Defendants shall certify and lodge the Administrative Record with the
20 Court and serve that administrative record on Plaintiff's counsel no later than
21 **September 24, 2025.**
- 22 6. Plaintiff shall file any motion regarding the Administrative Record no later than
23 **October 6, 2025.** Federal Defendants reserve the right to oppose any such
24 motions. The filing of any motions regarding the Administrative Record will
25 stay the remaining deadlines in this briefing schedule, and the Parties will submit
26 a new proposed scheduling order within 21 days of the Court's order on such
27 motions.
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B. Briefing on the Merits

1. If no motions related to the Administrative Record are filed, Plaintiff shall file its Motion for Summary Judgment and Opening Brief no later than **November 6, 2025**.
2. Federal Defendants shall file their combined Response to Plaintiff's Motion for Summary Judgment and Cross-Motion for Summary Judgment no later than **December 18, 2025**.
3. Pursuant to the parties' stipulation consenting to Clark County submitting an amicus brief, Clark County shall file its amicus brief no later than **December 18, 2025**.
4. Plaintiff shall file its combined Response to Defendant's Cross-Motion for Summary Judgment and Reply in Support of its Motion for Summary Judgment no later than **January 30, 2026**.
5. Plaintiff shall file its response to Clark County's amicus brief no later than **January 30, 2026**.
6. Federal Defendants shall file their reply in support of their Cross-Motion for Summary Judgment no later than **March 10, 2026**.

The parties respectfully request that the Court enter the foregoing schedule proposed by the parties.

Respectfully submitted this 4th day of June, 2025.

/s/ Jaimie L. Park

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IT IS SO ORDERED this 4th day of June 2025.


UNITED STATES MAGISTRATE JUDGE